

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

FILED ELECTRONICALLY

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CELTIC WOMAN LTD.,

Plaintiff,

-against-

CELTIC THUNDER, LTD,
CELTIC MAN, LTD., SHARON
BROWNE, WLIW LLC,
ALIGN ENTERTAINMENT GROUP LLC,
and GUSTAVO SAGASTUME

Defendants.
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No. 08-CV-0066 (TPG)

Declaration of Gustavo Sagastume

1. I am the former Vice President for Programming at PBS and am currently the President and CEO of International Media LLC, a company dedicated to the production, distribution and marketing of entertainment media. I make this declaration on personal knowledge in opposition to the plaintiff's motion for a preliminary injunction.

2. I have been personally acquainted with Defendant Sharon Browne since 2004, when in Cannes, France she presented me with the concept for what became "Celtic Woman" on PBS. Ms. Browne was the creator and original producer of "Celtic Woman." She had signed several female musicians to her record label, Celtic Collections Ltd., and was eager to develop a Celtic music production specifically aimed at the United States market. I was impressed by the performers, the music and the overall production that Ms. Browne put together. Ms. Browne and I subsequently communicated frequently as she prepared for the debut of "Celtic Woman" on PBS that I had secured for March

2005.

3. I am the co-executive producer with Sharon Browne of the new PBS show called "Celtic Thunder." My role in the development of "Celtic Thunder" has been limited to consulting with Ms. Browne, and with defendant WLIW, on the preparation of the show for public television distribution.

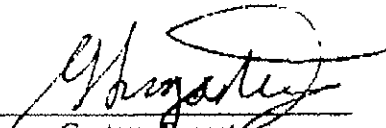
4. I have no authority over the naming of the show, nor do I have any authority over the extent to which Ms. Browne's past involvement with "Celtic Woman" is or is not referenced in the marketing of the show or associated products.

5. I have never been the promoter of "Celtic Thunder."

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I declare under penalty of perjury that the foregoing is true and correct.

Executed at Hollywood, Florida this 12th day of February, 2008.



Gustavo Vagstad